

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
IN RE PHARMACEUTICAL INDUSTRY)	
AVERAGE WHOLESALE PRICE)	MDL NO. 1456
LITIGATION)	Civil Action No. 01-12257-PBS
_____)	
)	Judge Patti B. Saris
THIS DOCUMENT RELATES TO:)	
<i>County of Suffolk v. Abbott Labs., et al.</i>)	
(E.D.N.Y. No. CV-03-229))	
<i>County of Westchester v. Abbott Labs., et al.</i>)	
(S.D.N.Y. No. 03-CV-6178))	
<i>County of Rockland v. Abbott Labs., et al.</i>)	
(S.D.N.Y. No. 03-CV-7055))	
<i>The City of New York v. Abbott Labs., et al.</i>)	
(S.D.N.Y. No. 03-CV-06054))	
_____)	

**DEFENDANTS' MOTION FOR A CASE MANAGEMENT
CONFERENCE AND FOR COORDINATION OF PLEADINGS**

Defendants in the above referenced cases-- *County of Suffolk v. Abbott Labs., et al.* ("Suffolk"), *County of Westchester v. Abbott Labs., et al.*, *County of Rockland v. Abbott Labs., et al.*, and *The City of New York v. Abbott Labs., et al.*-- and in other similar cases that are being transferred to this Court (collectively, the "New York County/City Cases"), respectfully move for a case management conference and for coordination of the pleadings in these Cases.

Defendants further request an order staying their time to respond to any and all New York County/City Cases until the plaintiffs in those Cases present one master pleading that is consistent with the Court's rulings in *Suffolk*.

Dated: February 11, 2005

Respectfully submitted,

ON BEHALF OF ALL DEFENDANTS SERVED
IN ACCORDANCE WITH F.R.C.P. 4 OR WHO
HAVE WAIVED SERVICE

/s/ Lyndon M. Tretter

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CERTIFICATE OF SERVICE

I certify that on February 11, 2005, a true and correct copy of the foregoing Defendants' Motion for a Case Management Conference and for Coordination of Pleadings was served on all counsel of record by electronic service pursuant to Case Management Order No. 2 by sending a copy to Verilaw Technologies for posting and notification to all parties.

/s/ Lyndon M. Tretter
Lyndon M. Tretter